

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MARY E. SHEPARD and the ILLINOIS)
STATE RIFLE ASSOCIATION,)
Plaintiff,)
-vs-) No. 11-405
LISA M. MADIGAN, solely in her official)
capacity as ATTORNEY GENERAL OF)
ILLINOIS, GOVERNOR PATRICK J.)
QUINN, solely in his official capacity as)
Governor of the State of Illinois,)
TYLER R. EDMONDS, solely in his)
official capacity as the State's Attorney)
of Union County, Illinois, and SHERIFF)
DAVID LIVESAY, solely in his official)
capacity as Sheriff of Union County,)
Defendants.)

SECOND MOTION FOR ENLARGEMENT OF TIME

Now come defendants, Lisa Madigan, Attorney General of the State of Illinois; Patrick J. Quinn, Governor of the State of Illinois; and Tyler R. Edmonds, State's Attorney of Union County, Illinois, by their attorney, Lisa Madigan, Attorney General of the State of Illinois, and, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, move this honorable Court for an additional 14 days, until July 22, 2011, in which to respond to plaintiff's complaint.

In support thereof, it is stated:

1. Defendants asked for an enlargement of time until July 8, 2011, in which to respond to plaintiff's complaint.
2. Defendants had prepared a draft motion to dismiss plaintiff's complaint and would have been prepared to file it on July 8, 2011.
3. On July 6, 2011, the United States Court of Appeals issued an extensive opinion on Second Amendment issues. *Ezell v. City of Chicago*, Slip Op. 10-3525 (7th Cir.

July 6, 2011).

4. In *Ezell*, the Seventh Circuit examined, for the first time, the standard of review applicable to statutes imputing Second Amendment rights in this circuit.

5. Defendants need additional time to assess the impact of *Ezell* and incorporate the opinion into any filing defendants make in this cause.

6. The undersigned attempted to contact plaintiffs' counsel to determine whether plaintiffs have any objection to the instant motion, but his call has not yet been returned.

7. Plaintiffs will not be prejudiced by the short enlargement requested.

WHEREFORE, defendants respectfully request an additional time of 14 days, up to and including July 22, 2011, within which to answer plaintiff's complaint or otherwise plead.

Respectfully submitted,

LISA MADIGAN, ATTORNEY GENERAL OF THE STATE OF ILLINOIS; PATRICK J. QUINN, GOVERNOR OF THE STATE OF ILLINOIS; and TYLER R. EDMONDS, STATE'S ATTORNEY OF UNION COUNTY, ILLINOIS,

Defendants,

Terence J. Corrigan, #6191237
Assistant Attorney General
Attorney for Defendants
500 South Second Street
Springfield, IL 62706
Telephone: (217) 782-5819
Facsimile: (217) 524-5091
tcorrigan@atg.state.il.us

LISA MADIGAN, Attorney General
State of Illinois,
Attorney for Defendants.
By: /s/Terence J. Corrigan
Terence J. Corrigan
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2011, I electronically filed Defendants' Second Motion for Enlargement of Time with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

whoward@freebornpeters.com

and I hereby certify that on July 8, 2011, I mailed by United States Postal Service, the document to the following nonregistered participant:

None

Respectfully submitted,

By: /s/Terence J. Corrigan

Terence J. Corrigan
Assistant Attorney General
Attorney for Defendant(s)
500 South Second Street
Springfield, IL 62706
Telephone: (217) 782-5819
Facsimile: (217) 524-5091
tcorrigan@atg.state.il.us